



February 2, 2024

United States Forest Service  
U.S. Department of Agriculture

RE: National Old Growth Amendment

To Whom it May Concern:

On behalf of the Rural Voices for Conservation Coalition (RVCC), I'd like to thank the Forest Service for protecting our old growth forests by, for the first time in the agency's history, amending all 128 National Forest System land management plans. We are eager to contribute to this effort and participate in the dialogue in order to establish a comprehensive and science-based management strategy that improves old growth conditions in the long term. The range of benefits produced by old growth trees cannot be understated. With the array of threats facing our forests, optimizing conditions to improve conservation and recruitment is essential. We hope that this national plan amendment will be socially sustainable and balance ecological as well as social and economic considerations.

RVCC strongly endorses practices that align with what we have dubbed "the Stewardship Economy" - an economy shaped by the need, and responsibility, to manage for the sustainability of both land and communities. At the heart of this concept is the need to develop a more reciprocal relationship between our communities and landscapes. In developing the old growth amendment, we trust that the agency will strike a thoughtful balance between adaptive forest management, effective wildfire mitigation, and sustainable and accessible recreation.

RVCC supports place-based collaboration in all-lands planning and management and support the Forest Service's provisions to allow for local adaptation and the integration of local knowledge. And while RVCC is supportive of this national plan amendment, we would like to note that there is a need for updates to the forest and grassland plans across the National Forest System, as many plans have not been updated in decades.

We support the Forest Service's intent to further incorporate the use of Indigenous knowledge in the agency's management of old growth forests. In the effort to preserve of old growth forests, Tribal leaders and practitioners should be treated as essential partners, rather than passive stakeholders. We recommend robust inter-agency education on Indigenous practices and implementation to the fullest extent possible.

Finally, as the national amendment is developed, we urge the agency to continue the consistent review and approval of vegetation management activities in order to effectively mitigate against the growing threat of wildfires, which are particularly devastating to old growth forests.

We appreciate the opportunity to provide this feedback. If we can provide any further input as the Forest Service continues to develop its old growth management strategy, please don't hesitate to contact me at [laurel@ruralvoicescoalition.org](mailto:laurel@ruralvoicescoalition.org).

Thank you,

A handwritten signature in black ink that reads "Laurel Harkness". The signature is written in a cursive, flowing style.

Laurel Harkness, Coalition Director  
Rural Voices for Conservation Coalition